

## ARGUMENTS

### Rejection of Claims on Art Grounds in the 05/24/2004 Office Action, and Traversal Thereof

In the 05/24/2004 Office Action, claims 1-70 were rejected on prior art grounds, under 35 U.S.C. 102(b) and 35 U.S.C 103(a).

Claims 1, 5-9, 12-19, 23-24, 27-32, 36-40, 43-50, 54-55, 58-63, 66-67, and 70 were rejected under 35 U.S.C. 102(e) as being anticipated by Carpenter-Smith (U.S. 5,838,973).

Claims 2-4, 10-11, 20-22, 25-26, 33-35, 41-42, 51-53, 56-57, 64-65, and 68-69 were rejected under 35 U.S.C. 103(a) as being unpatentable over Carpenter-Smith (U.S. 5,838,973) in view of Mutschler (U.S. 6,381,743).

Applicant asserts that the prior art references cited by the examiner do not anticipate nor do they make obvious the claims of the current invention. The above rejections of the claims 1-70 on the stated art grounds are traversed, and consideration of the patentability of the claims 1-70 is requested, in light of the following remarks.

Regarding Claim 1, the application refers to "a method in a data processing system...comprising the steps of: receiving a request to generate a data model...generating a diagram for each data element...determining whether an attribute in the data structure is associated with one of the data elements...displaying a graphical representation...determining whether the data structure includes a reference...displaying a reference link...determining whether the data structure includes a group attribute...displaying a group symbol...displaying a first link, and displaying a second link..." Of these steps only receiving a request to generate a data model requires input

from a user. By sharp contrast, Carpenter-Smith discloses a computerized modeling system that "guides the user through the object-oriented design process." In the modeling system of the reference each step is initiated by a selection by the user of a process icon specific to that step. Additionally, the user may be required to input additional data at each step. The invention of the current application does not require such input from the user, but is an entirely automated process, which performs the above mentioned steps in response to a single request from a user to generate a data model from a data definition file. Clearly the current invention is an example of a reduction in the number of steps in the method of the prior art, a simplification of the method of the prior art, and an improvement over the prior art. Accordingly, the invention described in claim 1 is asserted to represent a substantial advance in the art and is further asserted to be patentably distinct over the prior art.

Regarding claims 5-8, each of the steps mentioned in these claims is a step that is automatically performed by the data processing system in the method of the current invention. In the method disclosed by the reference user input is required for each step. The reference discloses that the collaborations icon is selected by a user which brings up an interaction diagram selection window from which the user selects collaborations previously entered by selecting the interaction, and selecting the ok button. By automating the steps of determining whether the name of the second element is within the definition of the first data element, determining whether the data element has the associated group attribute, determining whether the group attribute is within the definition of the data element, and storing information used to generate the data model in a graphical view file the process is simplified and represents a substantial advance in the

art. Therefore, applicant asserts that the invention as described in claims 5-8 is not anticipated by the prior art and is patentably distinct over the prior art.

Additionally regarding claims 5-8, these claims are all dependent claims of claim 1 which has been asserted to be fully patentable. Therefore, because patentable material is inherently a part of these claims, 5 through 8 are also asserted to be fully patentable on the basis of depending from a patentable claim.

Regarding claims 9, 12-14, and 16-17, these claims are alternate versions of the claimed method discussed above, claim 1. The patentability of these claims is supported by the above arguments supporting the patentability of claim 1.

Regarding claims 15 and 18, these claims are alternate versions of the claimed method discussed above (claims 5 and 8, respectively). The patentability of these claims is supported by the above arguments supporting the patentability of claims 5 and 8.

Regarding claim 19, the application refers to a method in a data processing system comprising multiple steps. Of these steps only receiving a request to generate a data definition file from a graphical representation requires input from a user. By sharp contrast, Carpenter-Smith discloses a computerized modeling system that "guides the user through the object-oriented design process." In the modeling system of the reference each step is initiated by a selection by the user of a process icon specific to that step. Additionally, the user may be required to input additional data at each step. The invention of the current application does not require such input from the user, but is an entirely automated process that performs the above-mentioned steps in response to a single request from a user to generate a data definition file from a graphical representation. Clearly the current invention is an example of a reduction in the number of steps in the

method of the prior art, a simplification of the method of the prior art, and an improvement over the prior art. Accordingly, the invention described in claim 19 is asserted to represent a substantial advance in the art and is further asserted to be patentably distinct over the prior art.

Regarding claim 23, each of the steps mentioned in this claim is a step that is automatically performed by the data processing system in the method of the current invention. In the method disclosed by the reference user input is required to create reference link. For example "the user clicks on the flight object line and drags the mouse pointer to the seat object line" (column 20, lines 29-29). Clearly, the present invention represents an improvement over the prior art based on simplifying the process. Therefore, the present invention is not anticipated by the prior art and is patentable.

Additionally regarding claim 23, this claim is a dependent claim of claim 19 which has been asserted to be fully patentable. Therefore, because patentable material is inherently a part of this claim, claim 23 is also asserted to be fully patentable on the basis of depending from a patentable claim.

Regarding claims 24 and 27-31, these claims are alternate versions of the claimed method discussed above, claim 19. The patentability of these claims is supported by the above arguments supporting patentability of claim 19.

Regarding claims 32 and 36-39, these are computer-readable medium versions of the claimed method discussed above (claims 1 and 5-8, respectively). The patentability of these claims is supported by the above arguments supporting the patentability of claims 1 and 5-8.

Regarding claims 40 and 43-49, these are computer-readable medium versions of the claimed method discussed above (claims 9 and 12-18 respectively). The patentability of these claims is supported by the above arguments supporting the patentability of claims 9 and 12-18 respectively.

Regarding claims 50 and 54, these are computer-readable medium versions of the claimed method discussed above (claims 19 and 23, respectively). The patentability of these claims is supported by the above arguments supporting the patentability of claims 19 and 23 respectively.

Regarding claims 55 and 58-62, these are computer-readable medium versions of the claimed method discussed above (claims 24 and 27-31, respectively). The patentability of these claims is supported by the above arguments supporting the patentability of claims 24 and 27-31 respectively.

Regarding claim 63, the data processing system of this claim comprises a memory device that displays a first graphical representation responsive to receiving a first request, and that generates a second data definition file responsive to receiving a second request. These requests are the only inputs required from a user. The prior art discloses a method which requires extensive input from a user. The user must perform several steps including not only selecting icons to initiate each step, but also inputting data. Clearly the current invention is an example of a reduction in the number of steps in the method of the prior art, a simplification of the method of the prior art, and an improvement over the prior art. Accordingly, the invention described in claim 63 is asserted to represent a substantial advance in the art and is further asserted to be patentably distinct over the prior art.

Regarding claim 66, The program of the present invention as claimed in claim 66 automatically stores the graphical representation with no input required from the user. The prior art does not disclose a program that stores information automatically. Additionally, regarding claim 66, this claim is a dependent claim of claim 63 which has been asserted to be fully patentable. Therefore, because patentable material is inherently a part of this claim, claim 66 is also asserted to be fully patentable on the basis of depending from a patentable claim.

Regarding claim 67, the program of the present invention as claimed in claim 67 automatically stores the graphical representation with no input required from the user. The prior art does not disclose a program that stores information automatically. Additionally, regarding claim 67, this claim is a dependent claim of claim 63 which has been asserted to be fully patentable. Therefore, because patentable material is inherently a part of this claim, claim 67 is also asserted to be fully patentable on the basis of depending from a patentable claim.

Regarding claim 70, this is a system version of the claimed method discussed above, claim 9. The patentability of these claims is supported by the above arguments supporting the patentability of claim 9.

Claims 2-4, 10-11, 20-22, 25-26, 33-35, 41-42, 51-53, 56-57, 64-65, and 68-69 were rejected under 35 U.S.C. 103(a) as being unpatentable over Carpenter-Smith (U.S. 5,838,973) in view of Mutschler (U.S. 6,381,743). The examiner asserted that Carpenter-Smith anticipates the method of the current invention and that the combination of Carpenter-Smith and Mutschler makes obvious specific definitions within some dependent claims. Applicant asserts that Carpenter-Smith does not disclose the method of

the current invention because that method is almost entirely automated while Carpenter-Smith discloses an interactive software tool that requires extensive input from a user. Based on the above arguments it has been asserted that the overall method of the invention is not anticipated by Carpenter-Smith; therefore, the potential obviousness of specific definitions by the combination of Carpenter-Smith and Mutschler is irrelevant and does not affect the patentability of the current invention.

Additionally regarding claims 2-4, 10-11, 20-22, 25-26, 33-35, 41-42, 51-53, 56-57, 64-65, and 68-69, each of these claims is a dependent claim of claim 1, 9, 19, 24, or 63, all of which have been asserted to be fully patentable. Therefore, because patentable material is inherently a part of these claims, claims 2-4, 10-11, 20-22, 25-26, 33-35, 41-42, 51-53, 56-57, 64-65, and 68-69 are also asserted to be fully patentable on the basis of depending from a patentable claim.

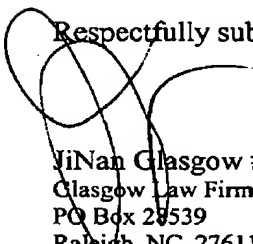
## CONCLUSION

In view of the foregoing, claims 1-70, constituting the claims pending in the application, are submitted to be fully patentable and in allowable condition to address and overcome the rejections.

If any issues remain outstanding, incident to the allowance of the application, Examiner Nahar is respectfully requested to contact the undersigned attorney at (919)-664-8222 or via email at [jnang@trianglepatents.com](mailto:jnang@trianglepatents.com) to discuss the resolution of such issues, in order that prosecution of the application may be concluded favorably to the applicant, consistent with the applicant's making of a substantial advance in the art and particularly pointing out and distinctly claiming the subject matter that the applicant regards as the invention.

This Office Action Response is submitted to the USPTO on August 24, 2004 via the Official USPTO Fax number 703-872-9306.

Respectfully submitted,



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